

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

**SABRINA ALLEN, individually and as  
representative of the estate of RAYMOND  
LUTHER ALLEN, J.R. ALLIYAH  
ALLEN, RAYVIN ALLEN, RAYMOND  
ALLEN, and JONISHA TISINO**

**VS.**

**CITY OF GALVESTON, COUNTY OF  
GALVESTON, and  
TASER INTERNATIONAL, INC.**

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**NO. 3:12-cv-00064**

**PLAINTIFFS' INITIAL DISCLOSURES**

COMES NOW, Sabrina Allen, et al, Plaintiffs in the above entitled and numbered cause, and pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, serves this, their Initial Disclosures to Defendants.

Respectfully submitted,

**THE PINKERTON LAW FIRM, PLLC**

/s/ C. Chad Pinkerton

**C. Chad Pinkerton**

Federal ID No. 1068659

**Ben R. Roberts**

Federal ID No. 1295256

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Houston, Texas 77006

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713-360-6810 (Facsimile)

**ATTORNEYS FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

I certify that opposing counsel is a known user of the Court's electronic filing system and that service of this document will be made through that system.

/s/ C. Chad Pinkerton

**INITIAL DISCLOSURES**

• ***Response to 26(a)(1)(i)***

Individuals with discoverable information:

Sabrina Allen  
c/o C. Chad Pinkerton  
Ben R. Roberts  
The Pinkerton Law Firm, PLLC  
5020 Montrose, Suite 550  
Houston, Texas 77006  
P: 713-360-6722  
F: 713-360-6810

*Plaintiff with personal knowledge of the events that make the basis of this litigation*

Deputy Daryl Temple  
Galveston County Sheriff's Office  
601 54<sup>th</sup> Street  
Galveston, Texas 77550

*Deputy that was at the scene of the incident and personal knowledge of the events that make up the basis of this litigation*

Deputy Nina Gillis  
Galveston County Sheriff's Office  
601 54<sup>th</sup> Street  
Galveston, Texas 77550

*Deputy that was at the scene of the incident and has personal knowledge of the events that make up the basis of this litigation*

Officer Rogelio Franco  
Galveston Police Department  
601 54<sup>th</sup> Street  
Galveston, Texas 77550

*Officer that was at the scene of the incident and has personal knowledge of the events that make up the basis of this litigation*

Officer C. McNeil  
Galveston Police Department  
601 54<sup>th</sup> Street  
Galveston, Texas 77550

*Officer that was at the scene of the incident and has personal knowledge of the events that make up the basis of this litigation*

Chris Williams  
3501 Avenue M, Apt. 2

Galveston, Texas 77550  
409-526-2182

*Individual that worked at the Waffle House and witnessed the events that make up the basis of this litigation.*

Rita Allen  
Raymond Allen, Jr.  
2526 Avenue L  
Galveston, Texas 77550  
409-599-9110

*Mother and father of the decedent and have personal knowledge of the events that make up the basis of this litigation.*

Rodney Allen  
409-939-8323

*Brother of the decedent and has personal knowledge of the events that make up the basis of this litigation.*

Myiesha  
Address unknown  
832-577-2648

*Individual that worked at the Waffle House and witnessed the events that make up the basis of this litigation.*

- ***Response to 26(a)(1)(ii)***

Documents Plaintiffs may use to support their claims:

Training and personnel records for the Deputies and/or Officers that responded to the scene of the incident.

All training manuals provided to the Deputies and/or Officers that responded to the scene of the incident.

All Taser training manuals published by the Galveston County Sheriff's Department and/or Galveston Police Department.

Video and audio cartridge of Deputy Temple's Taser recording of the incident.

All video recordings from Galveston Police Department and Galveston County Sheriff's Department dashboard cameras.

Medical and billing records from UTMB Galveston and Galveston County EMS, which are enclosed herein.

Death certificate of Raymond Allen from the Galveston County Medical Examiner.

All Incident Reports from Galveston Police Department and Galveston County Sheriff's Office documenting the incident that makes the basis of this lawsuit.

- ***Response to 26(a)(1)(iii)***

A computation of each category of damages claimed by the disclosing party:

Plaintiffs are claiming the following damages:

- A. Actual damages;
- B. Exemplary damages;
- C. Prejudgment and post-judgment interest;
- D. Attorneys' fees;
- E. Court costs; and
- F. All other relief to which Plaintiff is entitled.

There may be other types of financial harm to Plaintiffs, and thus Plaintiffs reserve the right to amend this response according to the Federal Rules of Civil Procedure.

To the extent that attorneys' fees and expenses are available for recovery, Plaintiffs seek to recover such. Plaintiffs reserve the right to amend this response according to the Federal Rules of Civil Procedure.

As for the computation of any of the aforementioned damages claimed by the disclosing party, this case is still in its infancy and Plaintiff will supplement such computation according to the Federal Rules of Civil Procedure.

- ***Response to 26(a)(1)(iv)***

Insurance agreements in possession of disclosing party:

Plaintiffs do not have any such agreements in their possession.